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Hearing Date and Time: May 9, 2006 at 10:00 a.m.
Objection Deadline: April 21, 2006 at 4:00 p.m.

Attorneys for IBEW Local 663 and
IAMAW District 10

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

DELPHI CORPORATION, et al.,

Debtors.

Chapter 11

Case No. 05-44481 (RDD)

(Jointly Administered)

**IBEW LOCAL 663 AND IAMAW DISTRICT 10'S OBJECTION TO DEBTORS'
MOTION TO REJECT THEIR COLLECTIVE BARGAINING AGREEMENTS
PURSUANT TO 11 U.S.C. SECTION 1113(c) AND TO MODIFY THEIR
RETIREE BENEFITS PURSUANT TO 11 U.S.C. SECTION 1114(g)**

The International Brotherhood of Electrical Workers, Local 663 and the International Association of Machinists and Aerospace Workers, District 10 (collectively "the Unions") object to Delphi's motion to reject their collective bargaining agreements because such motions fail to meet the criteria set forth in Section 1113(b) and (c).

The Unions further object to Debtors' motion to modify their retirees' benefits because they have failed to meet the criteria required by 11 U.S.C. Section 1114(f) and (g). In support of this objection, the Unions specifically incorporate by reference the Memorandum of Law in Support of IBEW Local 663 and IAMAW District 10's Objection to Debtors' Motion to Reject Collective

Bargaining Agreements Under 11 U.S.C. §1113(c) and to Modify Retiree Benefits Under 11 U.S.C. §1114(g), and the Declarations and Exhibits thereto, filed simultaneously on this date.

WHEREFORE, the Unions respectfully request that this Court enter an Order denying Debtors' Motion and continuing the collective bargaining agreements of the Unions and retaining the benefits of their retirees, in their present form, and granting such other and further relief as the Court deems just and proper.

Dated: April 21, 2006

Respectfully submitted,

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